Ladies and Gentlemen of the Federal Communications Commission;

I hold an Amateur Extra License W4FAL, a General Radio Telephone Operators License, and a GMRS license. I am also an electrical engineer and have worked in wireless and telecommunications for my entire career.

While I have seen many proposals come before the Commission over the years, this one "takes the cake".

To even suggest that unlicensed persons be allowed to use any portion of the Amateur spectrum (except as provided by Part 15) is counter to the history and sprit of Amateur Radio.

As an Amateur Frequency Coordinator for the SouthEastern Repeater Association, Inc in the State of North Carolina, the usage of 446.000 to 446.100 is alive and well. During the recent ARRL UHF contest in August, I worked stations over 500 kM from my location on 446 MHz FM. This band is used extensively by amateurs at emergency scenes for short range simplex communications, for cross band repeat functions, and at large amateur gatherings such as club meetings, hamfests and the like.

Just because an equipment vendor has made radios that operate on frequencies for use in another country that happen to be on the amateur bands in the United States of America, are we expected to allow unlicensed operation of those radios here? I certainly hope not.

I would also respectfully remind the Commission in considering this proposal, that US Amateurs share the 420 - 450 MHz spectrum with the US Military as SECONDARY users. As LICENSED Amateur Operators, we all know and understand what that means. Should for whatever reason the US military need the sole use of the band for a period of time, there are mechanisms in place to get the word out to Amateur operators of this fact. That would not be the case with these unlicensed foreign nationals.

I respectly ask that you dismiss RM-10521.

Frank A. Lynch, W4FAL 2528 Oakes Plantation Drive Raleigh, NC 27610-9328